

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,)	
)	
vs.)	
)	Case No.: 19-cr-00716 (DLC)
GEORGIOS NIKAS et al.,)	
)	
Defendants.)	

DECLARATION OF JONATHAN R. STREETER

Jonathan R. Streeter, an attorney duly licensed to practice in the State of New York and before this Court, declares the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I represent Telemaque Lavidas, a defendant in the above-captioned matter.
2. I make this declaration in support of Mr. Lavidas's Motion in Limine to Exclude Certain Hearsay Testimony and Evidence of Downstream Trading.
3. In a discovery letter dated November 6, 2019, the Government made the following disclosure to the defense:

[REDACTED]

(November 6, 2019 Letter from R. Cooper to defense counsel, attached hereto as Ex. A).

4. The Government has informed defense counsel that the individual referred to as "CC-1" in this disclosure and as "CC-4" in the Indictment is [REDACTED] and that that person will testify at trial.

5. On December 4, 2019, the Government sent a letter to defense counsel listing the individuals whom it claims are co-conspirators of Mr. Lavidas in this matter. (December 4, 2019 letter from R. Cooper to defense counsel, attached hereto as Ex. B).

6. The Government has also provided defense counsel with a proposed stipulation of brokerage records that it proposes to admit into evidence. (Proposed Stipulation attached hereto as Ex. C).

Dated: New York, New York
December 11, 2019

Respectfully submitted,

DECHERT LLP

By: /s/ Jonathan R. Streeter
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